

Remarks

Independent claims 1, 18, 27 and 28 have been amended to include the feature of claim 2 which has now been cancelled. The advantages of using the invention as presently claimed are set out on page 4 line 26 to page 5 line 9 of the specification.

Applicants note that the Examiner made the office action dated April 21, 2005 final, however, Applicants request that the finality be withdrawn. The Examiner's claim rejections are based on a combination of references including Donovan (US 6,480,588) which was not a cited reference in the first office action dated December 9, 2004. By citing the reference for the first time in the present office action and making the office action final, Applicants are deprived of their right to a full and fair hearing. The Examiner has failed to develop a clear issue between Applicants and the Examiner and unless the finality of the office action is withdrawn and the present claim amendments and response entered, Applicants will be deprived of the right to define the present invention in claims which will give patent protection to which the Applicant is justly entitled. The Examiner is respectfully requested to consider MPEP section 706.07 regarding proper examination practice. Accordingly, Applicants request that the finality of the office action dated April 21, 2005 be withdrawn and the present response entered and fully considered.

Regarding the Examiner's statement in paragraph 3 of the office action, Applicants merely point out that the non-patent literature publication was provided to attempt to assist the Examiner in respect of the background prior art but does not itself form part of the prior art. The copy provided was quite clear and legible, and the Examiner's comments are not understood. A further copy of the publication is provided with this response, though that provided previously was probably superior.

Regarding paragraph 4, the Examiner's rejections under 35 U.S.C. §112 have been addressed. A typographical error in claim 19 has also been corrected.

Turning to the Examiner's substantive rejections under 35 U.S.C. §103(a) the Examiner argues that the invention as presently claimed would have been obvious over O'Brien Jr (US 2003/0031165) in view of Donovan (US 6,480,588) and further in view of Dorenbosch (US 5,959,456). The Examiner's argument is set out in paragraphs 18 to 20, for example. Applicants respectfully traverse the Examiner's rejection for the following reasons:

Firstly, Applicants deny that Dorenbosch teaches the feature of "said communications network comprises a first zone and a second zone each comprising a plurality of terminals connected to a plurality of gateways and wherein a plurality of the terminal identifies if the first zone are also used for terminals of the second zone". On any reasonable interpretation of the above-mentioned feature, terminal identifiers are used both for first terminals in the first zone and second terminals in the second zone. The terminals are different terminals and are in different zones. Nevertheless, the same terminals identifier may be used which saves on having to co-ordinate terminal identifiers between the different zones which presents an administrative burden.

In contrast, Dorenbosch teaches a pager network in which a pager may roam (i.e. move into a new radio access coverage area) from a home zone to a foreign zone. The pager may share the same short address as another pager in the foreign zone, but is prevented from decoding messages addressed to that short address due to differences in the Simulcast System Identifiers (SSIDs) assigned to the different zones and pagers for which those zones are the home zone. Thus, in reality, the pagers do not share the same address when the difference in the SSID is also considered. Furthermore, Dorenbosch teaches preventing decoding of messages to a single pager which roams from a home zone to a foreign zone. In contrast, the present invention relates to reusing terminal identifiers for different terminals in

different zones. Accordingly, Dorenbosch clearly fails to teach the limitation on any reasonable interpretation thereof.

Secondly, Applicants deny that one skilled in the art would be motivated to combine the teachings of O'Brien, Donovan and Dorenbosch as alleged by the Examiner. At paragraph 20 the Examiner argues that "it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify O'Brien's invention with Dorenbosch's invention for terminals to have a common address because it would improve the capability of O'Brien's invention by providing simultaneous transfer of media to multiple locations of the same identification."

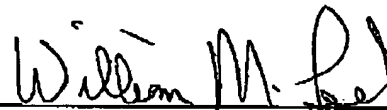
Applicants respectfully submit that, firstly, there is no suggestion or motivation in any of the references themselves or in the knowledge generally available to one of ordinary skill in the art to combine the three cited references as the Examiner alleges. If the Examiner intends to continue with this rejection it is kindly requested that he provide evidence of the alleged motivation. Applicants find it very hard to believe that one skilled in the art would seriously consider combining teachings in a patent directed to addressing in wireless pagers with teachings in a patent and patent application directed to voice over IP networks. Secondly, there must be a reasonable expectation of success that the combination would work. Applicants cannot see that there would be any expectation of success given the entirely different technologies involved. In particular, it is noted that pagers use circuit switched network technology whereas voice over IP networks are packet-switched. Furthermore, pagers are unidirectional receive-only devices which are unable to receive voice or any media other than simple text messages. Voice over IP networks are, as their name suggests, able to handle voice media among other things and in a bi-directional manner. There is the concept of a "call" between two or more terminals in voice over IP networks, whereas pagers cannot provide any call functionality. Thus, if the Examiner intends to continue this rejection, Applicants

respectfully request that full particulars of the alleged reasonableness of expectation of one skilled in the art be set out.

Accordingly, Applicants respectfully submit that the Examiner has failed to establish a prima facie case of obviousness and that, in fact, the invention as presently defined, is both novel and non obvious over the prior art references raised. Applicants request entry of this response and favorable reconsideration.

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Respectfully submitted,



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